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May 17, 2019

Via ECF

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square, Room 1106  
New York, NY 10007

Re: Securities and Exchange Commission v. Robert Donald Bruce Genovese,  
et al.,  
Case No. 1:17-cv-05821-LGS

Dear Honorable Judge Schofield,

My firm represents Defendants Robert Donald Bruce Genovese and B.G. Capital Group, Ltd. (collectively, the "Genovese Defendants") in the above-referenced action. The Genovese Defendants have reached a settlement in principle with the staff of the SEC, subject to Commission authorization and Court approval. As such, the Genovese Defendants and the SEC jointly request a 60 day stay in this case to permit the SEC to obtain Commission approval of the proposed settlement and seek a final judgment as to the Genovese Defendants. If granted by the Court, the stay shall apply to all Court imposed deadlines and suspend all discovery deadlines. The remaining defendant, Abraham "Avi" Mirman, does not oppose the relief sought herein. Upon the Commission's approval of the proposed settlement, and the Court's entry of the final judgment as to the Genovese Defendants, the remaining litigants shall provide the Court with a proposed Amended Civil Case Management Plan and Scheduling Order.

Very truly yours,

A handwritten signature in black ink, appearing to read 'WJM', is written over a horizontal line.

Walter J. Mathews

cc: All via ECM and Email  
Jack Kaufman, Counsel to SEC (kaufmanja@sec.gov)  
Margaret Dundon Spillane, Counsel to SEC (spillanem@sec.gov)  
Lara Shalov Mehraban, Counsel to SEC (mehrabanl@sec.gov)  
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William Joseph Leone, Counsel to Abraham "Avi" Mirman  
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Marc Rowin, Local Counsel to Robert Donald Bruce Genovese and B.G. Capital  
Group, Ltd. (mrowin@lynchrowin.com)